

SI



#### ANNUAL AUDITED REPORT **FORM X-17A-5** PART III

OMB Number: 3235-0123 Expires: March 31, 2016

Estimated average burden Mainous per response.....12.00

Section SEC FILE NUMBER

FACING PAGE

Washington Deleasers Pursuant to Section 37 of the Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

| REPORT FOR THE PERIOD BEGINNING                                   | 01/01/16                            | AND ENDING         | 12/31/16                       |
|---|-------------------------------------|--------------------|--------------------------------|
|   | MM/DD/YY                            |                    | MM/DD/YY                       |
| A. REGI   | STRANT IDENTIFIC                    | CATION             |                                |
| NAME OF BROKER-DEALER: Bestvest                                   | Investments, LTD                    | W. J. C. C. C.     | OFFICIAL USE ONLY              |
| ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use P.O. Box No.) |                                     | ox No.)            | FIRM I.D. NO.                  |
| 600 N. Jackson Street, Suite 3                                    | 05                                  |                    |                                |
|   | (No. and Street)                    |                    |                                |
| Media   | PA                                  | 19                 | 0063                           |
| (City)  | (State)                             | (                  | Zip Code)                      |
| NAME AND TELEPHONE NUMBER OF PER<br>James W. O'Connor             | SON TO CONTACT IN I                 | REGARD TO THIS RE  | PORT<br>610-891-2860           |
|   |                                     |                    | (Area Code - Telephone Number) |
| B. ACCO   | UNTANT IDENTIFI                     | CATION             |                                |
| INDEPENDENT PUBLIC ACCOUNTANT wh                                  | ose opinion is contained in         | n this Report*     |                                |
| Romeo & Chiaverelli, LLC CPA                                      | -                                   | ·                  |                                |
|   | Name - if individual, state last, j | îrst, middle name) |                                |
| One Bala Avenue, Suite 234  | Bala Cynwyd                         | PA                 | 19004                          |
| (Address)   | (City)                              | (State)            | (Zip Code)                     |
| CHECK ONE:  |                                     |                    |                                |
| Certified Public Accountant                                       |                                     |                    |                                |
| ☐ Public Accountant   |                                     |                    |                                |
| ☐ Accountant not resident in Unite                                | d States or any of its posse        | essions.           |                                |
|   | OR OFFICIAL USE O                   | NLY                |                                |
|   |                                     |                    |                                |
|   | •                                   | ,                  |                                |

\*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e)(2)



#### OATH OR AFFIRMATION

| ı, Jame                         | nes O'Connor,  | swear (or affirm) that, to the best of       |
|---------------------------------|--|--|
| my knowledge                    | ge and belief the accompanying financial statement and supporting sched              | lules pertaining to the firm of              |
|                                 | stvest Investments, LTD  | , as   |
|                                 | <del> </del>   | rect. I further swear (or affirm) that       |
|                                 | company nor any partner, proprietor, principal officer or director has any           |  |
|                                 | lely as that of a customer, except as follows:                                       | proprietary interest in any account          |
| Classified sole                 | lery as that of a customer, except as follows.                                       |  |
| N                               | None   |  |
|                                 |  |  |
| ,                               |  | _  |
| CO                              | COMMONWEALTH OF PENNSYLVANIA   |  |
|                                 | NOTARIAL CCAL  | gnature                                      |
|                                 | GENNARO VUONO  | gnature                                      |
| LOWER M                         | MERION TWP, MONTGOMERY COUNTY  Presid  | lent   |
| My C                            | Commission Expires Jan 14, 2019  | Title  |
| 入人                              |  |  |
| 1                               | mor Vuora  |  |
|                                 | Notary Public  |  |
| This report **                  | ** contains (check all applicable boxes):  |  |
| 🛛 (a) Facin                     | · · · · · · · · · · · · · · · · · · ·  |  |
|                                 | tement of Financial Condition.   |  |
| KI (c) State                    | tement of Income (Loss).   |  |
| 🛛 (d) State                     | tement of XIXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX                                       |  |
|                                 | tement of Changes in Stockholders' Equity or Partners' or Sole Proprieto             | rs' Capital.                                 |
|                                 | tement of Changes in Liabilities Subordinated to Claims of Creditors.                |  |
| (g) Computation of Net Capital. |  |  |
|                                 | nputation for Determination of Reserve Requirements Pursuant to Rule 1               |  |
| N/A(i) Infor                    | ormation Relating to the Possession or Control Requirements Under Rule               | : 15c3-3.                                    |
| X (j) A Re                      | econciliation, including appropriate explanation of the Computation of Ne            | et Capital Under Rule 15c3-1 and the         |
|                                 | nputation for Determination of the Reserve Requirements Under Exhibit                |  |
|                                 | Reconciliation between the audited and unaudited Statements of Financial solidation. | Condition with respect to methods of         |
| 🛛 (l) An C                      | Oath or Affirmation.   |  |
| (m) A co                        | opy of the SIPC Supplemental Report.   |  |
|                                 | eport describing any material inadequacies found to exist or found to have e         | xisted since the date of the previous audit. |
| O (o) A rep                     | eport on Internal Accounting Control   |  |
|                                 | itions of confidential treatment of certain portions of this filing, see secti       | on 240.17a-5(e)(3).                          |
| <b>X</b> (p) A rep              | eport on the exemption provision to Rule 15c3-3.                                     |  |

# BestVest Investments, LTD. Financial Statements and Additional Information

December 31, 2016

### BestVest Investments, LTD.

## <u>December 31, 2016</u>

## Table of Contents

|  | Pages    |
|--|----------|
| REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM  | 1-2      |
| FINANCIAL STATEMENTS:  |          |
| Statement of Financial Condition, December 31, 2016  | 3        |
| Statement of Income for the year ended December 31, 2016   | <b>4</b> |
| Statement of Changes in Stockholders' Equity for the year ended December 31, 2016  | 5        |
| Statement of Cash Flows<br>for the year ended December 31, 2016  | 6        |
| Notes to Financial Statements for the year ended December 31, 2016   | 7-9      |
| SUPPLEMENTAL INFORMATION:  |          |
| Computation for Determination of Reserve<br>Requirements under Rule 15c3-3 of the<br>Securities and Exchange Commission as<br>of December 31, 2016 | 10       |
| Computation for Net Capital under Rule 15c3-1 of the Securities and Exchange Commission as of December 31, 2016                                    | 11-13    |
| EXEMPTION REVIEW REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM   | 14       |
| EXEMPTION REPORT   | 15       |
| NDEPENDENT ACCOUNTANT'S AGREED UPON PROCEDURES REPORT<br>ON SCHEDULE OF ASSESSMENT AND PAYMENTS (FORM SIPC-7)                                      | 16-17    |
| SIPC REPORT  | 18       |

#### ROMEO & CHIAVERELLI LLC ONE BALA PLAZA SUITE 234 BALA CYNWYD, PA 19004

#### Report of Independent Registered Public Accounting Firm

To The Board of Directors of: BestVest Investments Media, PA

We have audited the accompanying statement of financial condition of BestVest Investments as of December 31, 2016, and the related statements of income, changes in stockholders' equity, and cash flows for the year then ended. These financial statements are the responsibility of BestVest Investments' management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with the standards of the Public Company Accounting Oversight Board (United States). Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of BestVest Investments as of December 31, 2016, and the results of its operations and its cash flows for the year then ended in conformity with accounting principles generally accepted in the United States.

The computation of net capital pursuant to Rule 15c3-1 of the Securities and Exchange Commission and the reserve requirements and possession or control requirements under Rule 15c3-3 of the Securities and Exchange Commission has been subjected to audit procedures performed in conjunction with the audit of BestVest Investments' financial statements. The computation of net capital pursuant to Rule 15c3-1 of the Securities and Exchange Commission and the reserve requirements and possession or control requirements under Rule 15c3-3 of the Securities and Exchange Commission is the responsibility of BestVest Investments' management. Our audit procedures included determining whether the computation of net capital pursuant to Rule 15c3-1 of the Securities and Exchange Commission or control requirements under Rule 15c3-3 of the Securities and Exchange Commission reconciled to the financial statements or the underlying accounting and other records, as applicable, and performing procedures to test the completeness and accuracy of the

information presented in the computation of net capital pursuant to Rule 15c3-1 of the Securities and Exchange Commission and the reserve requirements and possession or control requirements under Rule 15c3-3 of the Securities and Exchange Commission. In forming our opinion on the computation of net capital pursuant to Rule 15c3-1 of the Securities and Exchange Commission and the reserve requirements and possession or control requirements under Rule 15c3-3 of the Securities and Exchange Commission, we evaluated whether the computation of net capital pursuant to Rule 15c3-1 of the Securities and Exchange Commission and the reserve requirements and possession or control requirements under Rule 15c3-3 of the Securities and Exchange Commission, including its form and content is presented in conformity with 17 C.F.R.& 240.17a-5. In our opinion, the computation of net capital pursuant to Rule 15c3-1 of the Securities and Exchange Commission and the reserve requirements and possession or control requirements under Rule 15c3-3 of the Securities and Exchange Commission is fairly stated, in all material respects, in relation to the financial statements as a whole.

Romeo & Chiaverelli, LLC Bala Cynwyd, PA 19004

February 22, 2017

## BestVest Investments, LTD. Statement of Financial Condition December 31, 2016

#### **ASSETS**

| Cash and cash equivalents             | \$ 291,714         |
|---------------------------------------|--------------------|
| Receivables                           | 474.400            |
| Commissions                           | 174,193            |
| Advances                              | 810,932            |
| Investments                           | 0                  |
| Clearing organization deposit         | 50,000             |
| Property Plant and Equipment, net     | _18,285            |
| (Accumulated Depreciation of \$4,572) |                    |
| TOTAL ASSETS                          | <u>\$1,345,124</u> |

#### LIABILITIES AND STOCKHOLDERS' EQUITY

| Liabilities  |                               |                    |
|--|-------------------------------|--------------------|
|  | and accrued expenses          | <u>\$ 236,654</u>  |
| TOTAL LIABIL   | ITIES                         | \$ 236,654         |
| Stockholder's Equi<br>Common Stock, no<br>60,000 share<br>10,000 share | o par value                   | 10,000             |
| Additional Paid In   | Capital                       | 1,310,000          |
| Retained Deficit   |                               | (211,530)          |
| TOTAL STOC   | KHOLDERS' EQUITY              | <u>1,108,470</u>   |
| TOTAL LIABILI  | TIES AND STOCKHOLDERS' EQUITY | <u>\$1,345,124</u> |

## BestVest Investments, LTD. Statement of Income Year Ended December 31, 2016

#### **REVENUES**

| Commissions              | \$1,025,685          |
|--------------------------|----------------------|
| Interest and Dividends   | 13,266               |
| Investment Advisory Fees | 308,507              |
| Mutual Fund Fees         | 581, <del>44</del> 8 |
| Other Income             | 29,171               |
| Total Revenues           | <b>\$1,958,077</b>   |

#### **EXPENSES**

| Commission Expense                 | 772,420          |
|------------------------------------|------------------|
| Employee Compensation and benefits | 779,20 <b>9</b>  |
| Clearing and Execution Expense     | 98,099           |
| Occupancy                          | 47,554           |
| Other Operating Expenses           | <u>233,667</u>   |
| Total Expenses                     | <u>1,930,949</u> |
|                                    |                  |
| Net Income                         | <u>\$ 27,128</u> |

## BestVest Investments, LTD. Statement of Changes in Stockholders' Equity Year Ended December 31, 2016

#### Schedule of Retained Deficit

Beginning Retained Deficit (\$238,658)
Net Income 27,128

Retained Deficit (\$211,530)

Schedule of Additional Paid-In-Capital

Additional Paid in Capital \$1,310,000

Additional Paid in Capital \$1,310,000

Schedule of Common Stock

Common Stock, without par value,

60,000 shares authorized,

10,000 shares issued and authorized \$10,000

Common Stock \$10,000

Total Stockholders' Equity \$1,108,470

## BestVest Investments, LTD. Statement of Cash Flows Year Ended December 31, 2016

| Cash flows from operating activities:                  |                   |
|--|-------------------|
| Net Income   | \$ 27,128         |
| Depreciation   | 4,572             |
| Adjustments to reconcile net income to net cash        |                   |
| provided by operating activities:                      |                   |
| Change in commissions receivable                       | (26,454)          |
| Change in advances                                     | (40,103)          |
| Change in Investment                                   |                   |
| Change in Deposits and Prepaids Change in Other Assets |                   |
| Change in Other Assets                                 |                   |
| Change in accounts payable and accrued expenses        | 41,292            |
| Total adjustments                                      | (20,693)          |
|  |                   |
| Net cash provided by                                   |                   |
| operating activities                                   | <u>6,435</u>      |
|  |                   |
| Cook flows from investing activities                   |                   |
| Cash flows from investing activities:                  |                   |
| Net cash used for investing activities                 | 0.00              |
|  |                   |
| Cash flows from financing activities:                  |                   |
|  |                   |
| Net cash used for financing activities                 | 0.00              |
|  |                   |
| Net change in cash and cash equivalents                | 6,435             |
| THO Condings in cash and cash equivalents              | <u> </u>          |
| Cash and cash equivalents at beginning of year         | <u> 285,279</u>   |
|  |                   |
| Cash and cash equivalents end of year                  | <u>\$ 291,714</u> |
|  |                   |
| Supplemental Disclosure of Cash Flow Information –     |                   |
| Cappionicinal Discussion of Cash Flow Information -    |                   |
| Interest Paid \$2,617                                  |                   |
| Taxes Paid \$12.402                                    |                   |

## BestVest Investments, LTD. Notes to Financial Statements December 31, 2016

#### NOTE 1 - BUSINESS AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The Company was incorporated on January 20, 1995 under the laws of the State of Michigan. It is a broker-dealer registered with the SEC and is a member of FINRA. It is engaged in the sale of securities including equities, municipal bonds and other financial instruments. The company also has insurance and investment advisory businesses.

The following comprise the company's significant accounting policies:

#### Method of Accounting

The Company maintains its books and records on the accrual basis recognizing revenue when earned and expenses when incurred in conformity with generally accepted accounting principles.

#### Recognition of Revenue

Commissions and related clearing expenses are recorded on a trade date basis as securities transactions occur. Mutual Fund Fees received (12b-1 Fees) are recognized as income by the Company as received from the fund companies.

#### Cash

For purposes of the statement of cash flows, the Company includes as cash amounts on deposit at banks. The Company considers all highly liquid debt instruments purchased with an original maturity of three months or less to be cash equivalents.

#### Use of Estimates

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

#### Accounting for Uncertainty in Income Taxes

Effective January 1, 2009, the Company adopted the provision of FASB Accounting Standards Codification 740-10 (formerly FIN 48) "Accounting for Uncertainty in Income Taxes" ("ASC 740-10"). ASC 740-10 Clarifies the accounting for uncertainty in income taxes recognized in an enterprise's financial statements by prescribing a recognition threshold and measurement attributes for the financial statement recognition and measurement of a tax position taken or expected to be taken in a tax return. ASC

740-10 also provides guidance on derecognition, classification, interest and penalties accounting for interim periods, disclosure and transition. It is the Company's policy to record interest and penalties related to uncertain income tax positions, if any, as a component of income tax expense. Prior to adopting ASC 740-10, the Company used the guidance in ASC 450 (formerly SFAS No. 5 "Accounting for Contingencies"). The adoption of ASC 740-10 had no effect on the financial statements of the Company.

As of December 31, 2016, the Company had no uncertain tax positions that would require recognition or disclosure in the financial statements. The Company files U.S. and Pennsylvania income tax returns. Returns for the years ended December 31, 2016 to 2012 remain open for audit.

#### NOTE 2 - NET CAPITAL REQUIREMENT

The Company is subject to the Securities and Exchange Commission Uniform Net Capital Rule (Rule 15c3-1), which requires the maintenance of minimum net capital and requires that the ratio of aggregate indebtedness to net capital, both as defined, shall not exceed 15 to 1. At December 31, 2016, the Company had a net capital of \$ 228,150 which was \$ 212,373 in excess of its required net capital of \$15,777. The Company's net capital ratio was 1.04 to 1.

#### NOTE 3 - CONCENTRATIONS OF CREDIT RISK AND OTHER MATTERS

The Company keeps its cash with high credit quality financial institutions. The account balances often exceed the FDIC insurance limit.

The Company clears its introduced transactions through another broker-dealer, which is highly capitalized, and a member of all major securities exchanges. Nonperformance by its clearing broker in fulfilling its contractual obligations pursuant to securities transactions may expose the Company to risk and potential loss.

#### NOTE 4 - FINANCIAL INSTRUMENTS WITH OFF-BALANCE SHEET CREDIT RISK

In the normal course of business, the Company's customer activities involve the execution, settlement and financing of various customer securities. These activities may expose the Company to off-balance sheet credit risk in the event the customer is unable to fulfill its contracted obligations. The Company is therefore exposed to risk of loss on these transactions in the event of a contra party being unable to meet the terms of their contracts, which may require the Company to purchase or sell financial instruments at prevailing market price

#### **NOTE 5 - GUARANTEES**

ASC 460-10, Guarantees, requires the Company to disclose information about its obligations under certain guarantee arrangements. ASC 460-10 defines guarantees as contracts and indemnification agreements that contingently require a guarantor to make payments to the guaranteed party based on changes in an underlying that is related to an asset, liability or equity security of a guaranteed party. ASC 460-10 also defines guarantees as contracts that contingently require the guarantor to make payments to the

guaranteed party based on another entity's failure to perform under an agreement as well as indirect guarantees of the indebtedness of others.

The Company guarantees all of the customer margin account balances held by its clearing broker. The Company is responsible for payment to its clearing broker for any loss, liability, damage, cost or expense incurred as a result of customers failing to comply with margin or margin maintenance calls on all margin accounts. In the event of any customer default, the Company has rights to the underlying collateral provided. Given the existence of the underlying collateral provided as well as the negligible historical credit losses, the Company does not maintain any loss reserve.

#### **NOTE 6 - REGULATORY ACTIONS**

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, The Company submitted a Letter of Acceptance, Waiver and Consent (ÄWC") on June 26, 2016. The Company, without admitting or denying the findings, submitted the AWC with a censure and fine of \$15,000 for the alleged failure to establish and maintain a supervisory system, including written policies and procedures, regarding the sale of Non-Traditional ETF's in violation of NASD Conduct Rule 3010 and FINRA Rule 2010. The firm was also ordered to offer restitution to one customer which the customer refused to accept.

#### **NOTE 7 - COMMITMENTS**

The Company has a lease agreement for office space in Media, PA. The term of this lease is from March 1, 2016 to February 28, 2021. In addition, the Company is obligated to pay for the proportional amount of the building costs. Future minimum lease payments as of December 31, 2016 are as follows:

| 2017 | \$51,034 |
|------|----------|
| 2018 | \$51,876 |
| 2019 | \$52,535 |
| 2020 | \$53,786 |
| 2021 | \$ 9,006 |

Rent expense for 2016 was \$47,554.

#### **NOTE 8 - SUBSEQUENT EVENTS**

Events of the Company subsequent to December 31, 2016 have been evaluated through February 22, 2017, which is the date the financial statements were available to be issued, for the purpose of identifying events requiring recording or disclosure in the financial statements for the year ended December 31, 2016. No subsequent events were identified that required disclosure.

#### BESTVEST INVESTMENTS, LTD.

# COMPUTATION FOR DETERMINATION OF RESERVE REQUIREMENTS UNDER RULE 15c3-3 OF THE SECURITIES AND EXCHANGE COMMISSION AS OF DECEMBER 31, 2016

BestVest Investments, LTD. claims an exemption from Rule 15c3-3 based on Section 15c3-3(k)(2)(ii) who, as an introducing broker or dealer, clears all transactions with and for customers on a fully disclosed basis with a clearing broker or dealer, and who promptly transmits all customer funds and securities to the clearing broker or dealer which carries all of the accounts of such customers and maintains and preserves such books and records pertaining thereto pursuant to the requirements of Rules 17a-3 and 17a-4, as are customarily made and kept by a clearing broker or dealer. RBC Correspondent Services is the clearing broker.

### BESTVEST INVESTMENTS, LTD.

## COMPUTATION OF NET CAPITAL UNDER RULE 15c3-1 OF THE SECURITIES AND EXCHANGE COMMISSION

### AS OF DECEMBER 31, 2016

### NET CAPITAL

| Total Stockholders' Equity Qualified for Net Capital                                     | \$1,108,470                 |
|--|-----------------------------|
| Deduct non-allowable assets  |                             |
| Investments and receivables from affi<br>and prepaids<br>Other deductions and/or charges | liates<br>851,343<br>28,977 |
| Total Deductions   | <u>880,320</u>              |
| Net Capital before haircuts  | <u>\$_228,150</u>           |
| Less:<br>Haircuts  | 0                           |
| Net Capital  | <u>\$ 228,150</u>           |

#### **BESTVEST INVESTMENTS, LTD.**

## COMPUTATION OF NET CAPITAL UNDER RULE 15c3-1 OF THE SECURITIES AND EXCHANGE COMMISSION

### AS OF DECEMBER 31, 2016

#### **AGGREGATE INDEBTEDNESS**

| THE STATE OF THE S |                   |
|--|-------------------|
| Items included in statement of financial condition   |                   |
| Accounts payable and accrued expenses  | \$236,654         |
| Total aggregate indebtedness   | <u>236,654</u>    |
| COMPUTATION OF BASIC NET CAPITAL REQUIREMENTS  |                   |
| Minimum net capital requirement  | <u> 15,777</u>    |
| Excess net capital at 1500%  | <u>\$ 204,485</u> |
| Excess net capital at 1000%  | <u>\$ 212,373</u> |
| Ratio: Aggregate Indebtedness to Net Capital   | 1.04 to 1         |

#### BestVest Investments, LTD.

### **COMPUTATION OF NET CAPITAL UNDER RULE 15c3-1**

### OF THE SECURITIES AND EXCHANGE COMMISSION

#### As of December 31, 2016

RECONCILIATION WITH COMPANY'S COMPUTATION (Included in Part IIA of Form X-17A-5 as of December 31, 2016

| Net Capital, as reported in Company's<br>Part IIA (unaudited) FOCUS Report | \$ 228,150 |
|--|------------|
| Net Audit Adjustments  | 0          |
| Net Capital per above (Note-2)   | \$ 228.150 |

#### ROMEO & CHIAVERELLI LLC ONE BALA PLAZA SUITE 234 BALA CYNWYD, PA 19004

## Report of Independent Registered Public Accounting Firm Exemption Report Review

To the Board of Directors: BestVest Investments Media, PA

We have reviewed management's statements, included in the accompanying Exemption Report, on which BestVest Investments identified the following provisions of 17 C.F.R. ~15c3-3(k) under which BestVest Investments claimed an exemption from 17 C.F.R. ~240.15c3-3:(2)(ii). SEC Rule 15c3-3(k)(2)(ii) and BestVest Investments stated that BestVest Investments met the identified exemption provisions throughout the most recent fiscal year without exception. BestVest Investments' management is responsible for compliance with the exemption provisions and its statements.

Our review was conducted in accordance with the standards of the Public Company Accounting Oversight Board (United States) and, accordingly, included inquiries and other required procedures to obtain evidence about BestVest Investments' compliance with the exemption provisions. A review is substantially less in scope than an examination, the objective of which is the expression of an opinion on management's statements. Accordingly, we do not express such an opinion.

Based on our review, we are not aware of any material modifications that should be made to management's statements referred to above for them to be fairly stated, in all material respects, based on the provisions set forth in paragraph (k)(2)(ii) of Rule 15c3-3 under the Securities Exchange Act of 1934.

Romeo & Chiaverelli, LLC

Bala Cynwyd, PA

February 22, 2017



600 North Jackson Street Suite 305 Media, Pa 19063

> 800-434-1776 610-891-2860 Fax: 610-565-8819

February 3, 2017

#### **EXEMPTION REPORT**

We confirm, to the best of our knowledge and belief that:

- 1. The Firm claimed an exemption from SEC rule 15c3-3 under the provisions in parageraph (k)(2)(ii) throughout the calendar year January 1, 2016 to December 31, 2016;
- 2. The Firm met the identified exemption provisions in SEC rule 15c3-3(k)(2)(ii) throughout the calendar year January 1, 2016 to December 31, 2016 without exception.

James W. O'Connor, President BestVest Investments, Ltd. 600 N. Jackson Street, Suite 305 Media, PA 19063 (610) 891-2870

#### ROMEO & CHIAVERELLI LLC ONE BALA PLAZA SUITE 234 BALA CYNWYD, PA 19004

## Independent Accountant's Agreed-Upon Procedures Report On Schedule Of Assessment And Payments (Form SIPC-7)

To The Board of Directors of: BestVest Investments Media, PA

In accordance with Rule 17a-5(e)(4) under the Securities Exchange Act of 1934, we have performed the procedures enumerated below with respect to the accompanying Schedule of Assessment and Payments (Form SIPC-7) to the Securities Investor Protection Corporation (SIPC) for the year ended December 31, 2016, which were agreed to by BestVest Investments, and the Securities and Exchange Commission, Financial Industry Regulatory Authority, Inc. and SIPC, solely to assist you and the other specified parties in evaluating BestVest Investments' compliance with the applicable instructions of Form SIPC-7. BestVest Investments' management is responsible for BestVest Investments' compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the Public Company Accounting Oversight Board (United States). The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose. The procedures we performed and our findings are as follows:

- 1. Compared the listed assessment payments in Form SIPC-7 with respective cash disbursement records entries, noting no differences;
- 2. Compared the amounts reported on the audited FormX-17A-5 for the year ended December 31, 2016, as applicable, with the amounts reported in Form SPIC-7 for the year ended December 31, 2016, noting no differences;
- 3. Compared any adjustments reported in Form SIPC-7 with supporting schedules and working papers, noting no differences;
- 4. Proved the arithmetical accuracy of the calculations reflected in Form SIPC-7 and in the related schedules and working papers supporting the adjustments, noting no differences; and
- 5. Compared the amount of any overpayment applied to the current assessment with the Form SIPC-7 on which it was originally computed, noting no differences.

We were not engaged to, and did not conduct an examination, the objective of which would be the expression of an opinion on compliance. Accordingly, we do not express

such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the specified parties listed above and is not intended to be and should not be used by anyone other than these specified parties.

Romeo & Chiaverelli, LLC

Bala Cynwyd, PA

February 22, 2017

# BESTVEST INVESTMENTS, LTD. SCHEDULE OF ASSESSMENT AND PAYMENTS TO THE SECURITIES INVESTOR PROTECTION COPRPORATION YEAR ENDED DECEMBER 31, 2016

| Period Covered<br>Amount |   | Date Paid         |              |
|--------------------------|---|-------------------|--------------|
|                          | ent reconciliation for the period<br>to December 31, 2016 |                   | \$1,733      |
| Payment Schedu           | ile:  |                   |              |
| SIPC-6<br>SIPC-7         |   | 7-14-16<br>2-1-17 | 1,223<br>510 |
| Balance                  |   |                   | \$ 0.00      |